



Federal Regulatory Affairs

2300 N St. NW, Suite 710 Washington DC 20037

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April 2, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On March 29, 2012, Lois Hedgpeth, Executive Vice President, Integration, Frontier Communications, and the undersigned met with Angie Kronenberg, Wireline Legal Advisor to Commissioner Clyburn.

In the meeting the participants discussed the Petition for Clarification that Frontier filed with Windstream,¹ which requested the Commission to clarify that it did not intend to flash cut existing originating intrastate access rates for VoIP-terminating access traffic to the interstate rate level. Frontier explained that the effect of such an action could have significant revenue impacts on an ongoing basis as there is no originating access transition currently in place that would harmonize originating intrastate or interstate rates.

While Frontier urged the Commission to issue the clarification discussed above, the parties also discussed the possibility of alternative measures if the Commission does not. If the Commission decides that the interstate rate is the applicable end rate for the VoIP-PSTN traffic at issue, then the Commission could delay the effective date of the rate change for a number of years, specifically a two year delay in the effective date was discussed as a reasonable transition.

Frontier also discussed the aspect of its *Petition* that asked the Commission to reconsider its decision to require broadband deployment to one location per \$775 in CAF Phase I support. Specifically, Frontier noted its support for a recent Windstream proposal that would allow carriers additional flexibility to meet the Commission's CAF Phase I goals.²

¹ See Petition for Reconsideration and/or Clarification filed by Frontier Communications Corp. and Windstream Communications, Inc. ("*Petition*"), WC Docket 10-90, et al., at 21-29 (filed Dec. 29, 2011).

² See Letter from Jennie B. Chandra, Windstream Communications, to Marlene H. Dortch, Federal Communications Commission, WC Dkt. 10-90 et al. (filed Mar. 21, 2012).

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Please feel free to contact me with any further questions.

Sincerely,

A handwritten signature in blue ink, reading "Michael Saperstein, Jr." with a stylized flourish at the end.

Michael D. Saperstein, Jr.
Director of Federal Regulatory Affairs
Frontier Communications
(202) 223-6807

cc: Angie Kronenberg